

IN the Middle District  
Court of Pennsylvania

Lamont Zamichieli

V.

J. B. MERRITTS, et al.

Plaintiff

Defendants

FILED

OCT 30 2023

DEPUTY CLERK

Signed: *[Signature]*

Civil #

3:20-CV-00180

Executed/Filed: Lamont Zamichieli  
 Innate # LW-2870  
 SCI-Phoenix  
 1200 Mokychic Drive  
 Collegeville, PA 19426

Prose Plaintiff

" Motion to Compel Discovery "

- ① Now this 22nd day of October 2023, I Prose Plaintiff Lamont Zamichieli Respectfully files this Motion for an Order of the Court Compelling Defendants to Produce Requested Camera Footages Immediately and Order that all Request for Admissions under Fed civil P. Rule 36 Directed to Defendant MERRITTS, Parkes, Kendrick and Spory be admitted as to all factual content due to defendants failure to timely Respond to the Discovery requests also Order that The Defendants is Sanctioned (\$10,000) ten thousand dollars due to their non-compliance. (see: attached included supporting 3 page) (1 page exhibit - Brief along with this motion) copies All Sent to Defendants on 10/25/2023 via U.S.A.S. mail true correct.
- ② Defendant MERRITTS, Parkes, Kendrick, Spory has Defaulted and failed to timely Respond to Request for Admissions under Rule 36! All is Therefore Deemed admitted on record.
- ③ Defendants Initially had to Respond by August 25, 2023 which is 30 days after They was Sent the requestes and They was given an extension of 30 additional days or until September 24, 2023 to Respond but still has not yet Responded as of 10/22/2023 even after multiple follow up written letters to them Reminding

SCI- Phoenix

Name

Lamont Zamicheli

Number

# LW-9870

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Middle District Court of PA  
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